



Craigdale
HOUSING ASSOCIATION

Equalities Strategy

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Craigdale Housing Association Equalities Strategy

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1.0 Introduction and Purpose

The population of Craigdale's area of operation in Castlemilk is predominantly white Scottish at the moment however that dynamic has been changing over the past decade with other ethnic groups starting to move to the area.

Equality is not always about treating everyone the same – it is about recognising our differences and treating people accordingly so that the outcome for each person is the same.

We recognise that there are specific groups and individuals in society who experience discrimination, harassment and exclusion as a result of different aspects of their identity. This can have a profound impact on their lives and adversely affect the opportunities open to them. Craigdale Housing Association (CHA) is committed to proactively tackling this discrimination and disadvantage.

We know good housing is a basic human need. It provides the foundation for good health and opportunities for individuals and contributes to sustainable places and quality of life for communities. So, CHA plays a vital part in ensuring the welfare, protection and access to opportunities for everyone in its area of operation.

Craigdale's mission, vision and values underpin the work we will undertake within this strategy:

MISSION: "We are a Housing Association passionate about providing excellent affordable homes and services for our community"

VISION: "Changing lives for the better"

VALUES:

Respect: We will treat people with courtesy, politeness, and kindness; recognising that people have rights, opinions and experiences.

Openness: We will be transparent and accountable in all our actions and decision making.

Trust: We will be honest, objective, consistent, open and lead by example in everything that we do.

Listening: We will actively listen to what people tell us and we will remain neutral.

This strategy demonstrates our approach to meeting Outcome 1: Equalities in the Scottish Housing Charter:

'Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services'

This strategy begins with a summary of what we know about the diversity of our customers and our staff team. It then summarises an assessment of our current approach to equality and diversity across different parts of our operation:

- Knowing our customers
- Leadership, partnership and organisational commitment
- Involving our customers

- Responses services, access and customer care
- A skilled and committed workforce

It uses this assessment to identify key objectives and sets out an action plan for 2022/24 for the first steps in achieving these objectives.

2.0 Our Equalities Duty

As Registered Social landlords we have a duty to service users to encourage better and positive equalities outcomes for our tenants, service recipients, staff, board members and members of the wider community. We are committed to performing our duties and performing our functions in a way which achieves this aim. We will continue to work closely with all of our customers and staff to better understand how we can achieve our aims.

Duties under the Housing (Scotland) Act 2010

These require us to perform our functions in a way which encourages equal opportunities and in particular the observance of the requirements of the law relating to equal opportunities.

Duties under the Equality Act 2010

These duties requires us in the exercise of our functions, to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010;
- advance equality of opportunity between people who share a protected characteristic and those who do not; and
- foster good relations between people who share a protected characteristic and those who do not.

Regulatory Requirement

The Scottish Housing Regulator states:

Social landlords must work to understand the individual needs of their tenants and other service users, and to deliver services that recognise and meet these needs. As part of this we require landlords to ask for equalities information from their tenants and other service users, and to use it to inform their decision making. Social landlords must take equalities impacts into account when taking decisions that affect their tenants and other service users.

We further expect landlords to facilitate joint working with tenants and other service users to help ensure customer-focused decision making which recognises that people with different protected characteristics may have different needs.

Through our regulatory role we further promote equality across social landlords by, for example:

- *conducting thematic inquiries on equalities where appropriate;*
- *highlighting and sharing positive practice where we find it; and*
- *providing accessible and comparable information about each landlord's performance to empower tenants and other service users, and give them a voice.*

We have set Regulatory Standards of Governance and Financial Management for social landlords. One Standard is that social landlords conduct their affairs with honesty and integrity. This requires landlords to pay due regard to eliminate discrimination, advance equality and foster good relations across the range of protected characteristics. The standards also require registered social landlords (RSLs) to have effective plans in place to ensure that suitable people are readily available to take on leadership roles on their governing bodies when others leave or need to be replaced. This planning should take into account how they will achieve the appropriate and effective composition and profile of governing body members. Achievement of the RSL's business purpose is helped by having a diverse governing body that can better understand its tenants, other service users, staff and the wider environment within which it operates.

Each year we require landlords to confirm through their Annual Assurance Statement that they comply with our requirements, or what they are doing to improve their compliance.

We will ensure that we meet all regulatory requirements relating to equalities by ensuring that we follow all regulatory guidance in all our work. We will also ensure that by the use of Equality Impact Assessments due regard is given to the effect any policy will have on any person in one of the protected characteristics categories.

3.0 [Links to Key Documents](#)

[Equalities Strategy and Data Protection Policy](#)

The collection and usage of equality data must comply with the requirements of data protection law and equality data must be processed in line with data protection legal requirements. CHA will ensure that any data collected as part of this strategy is handled according to the Data Protection Policy and its related retention periods. All data will also be collected in line with the organisations privacy Notice.

[Equalities Strategy and Tenant Participation Strategy](#)

Social landlords have a statutory duty to develop a tenant participation strategy, and the collection of equality data is critical to the effective implementation of this strategy. For example, when arranging meetings, equality data gathered in respect of the protected characteristics can be used to address individuals' needs by providing:

- accessible venues for disabled people;
- language interpreters;
- suitable crèche facilities.

CHA will ensure that relevant data is collected from all board members and involved tenants to ensure that relevant support is put in place to make sure that participation is inclusive.

[Equalities Strategy and Customer Service Standards](#)

The Scottish Social Housing Charter, Standard 1 sets out a clear link between customer care and the equality strategy:

“...every tenant and other customer have their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.”

Having good information about individuals' needs, including equality information, is essential to enable social landlords to ensure those needs can be addressed.

4.0 Equalities and Diversity: What do we know?

We hold a large amount of information about our tenants and service users, and we are currently working with our Data Protection Officer to ensure that this is held in the correct manner.

Over the period of this strategy, we will work on translating the information we hold into a usable and meaningful format which can be used to inform policy and strategy across the whole business. We will do this whilst ensuring that the data we hold is in no way breaching our policy on data protection.

5.0 Equality Framework Assessment

The Equality Framework for Local Government looks at four themes for Equality and Diversity. These are:

- Understanding and Working with your Communities
- Leadership and Organisational Commitment
- Responsive Services and Customer Care
- Diverse and Engaged Workforce

This framework (App 1) allows organisations to self-assess their performance with regard to Equalities. An initial assessment against this framework will be used to assess CHA's performance to this end. From this assessment a list of improvement objectives and an action plan will be formulated.

The framework has four levels for self -assessment which are:

1. Developing - The developing level criteria contain the basic building blocks for each priority. An organisation at the Developing level has made an organisational commitment to improving equality. It is putting in place processes to deliver on equality issues and is working towards meeting and exceeding the statutory requirements.
2. Achieving - An organisation at the Achieving level has policies, processes and procedures in place and is delivering some good equality outcomes. It is not only meeting but can demonstrate exceeding statutory requirements.
3. Excellent - An organisation at the excellent level has mainstreamed equality throughout the organisation and can demonstrate that it is delivering significant outcomes across its services that are making a difference in its communities. The organisation not only exceeds statutory requirements, and it is an exemplar council for equality and diversity in the local government and wider public sector.
4. Not meeting any of the criteria would mean that no assessment can be made

| Service Area: Understanding and Working with Community | | 2022 | Self | - |
|--|---|------------|------|---|
| Assessment | | | | |
| 1 | <p>Collecting and Sharing Information</p> <p><i>The Organisation has gathered and published information and data on the profile of its communities and the extent of inequality and disadvantage. Plans are in place to collect, share and use equality information.</i></p> <ul style="list-style-type: none"> • Craigdale is clear about what sources of information (both local and national) are relevant and useful. • Craigdale is compliant with GDPR legislation in its collection, analysis storage and use of data and information and has all security measures needed in place. • Craigdale has a dedicated DPO resource in place to ensure legislative and regulatory compliance. | Developing | | |
| 2 | <p>Analysing and using data and information</p> <p><i>Systems are being developed to analyse soft and hard data/intelligence about tenants, their needs and aspirations.</i></p> <ul style="list-style-type: none"> • Equalities information is collected and taken account of. • Craigdale is compliant with UKGDPR legislation, analysis and use of data and information. | Developing | | |
| 3 | <p>Effective Community Engagement</p> <p><i>Engagement mechanisms and structures are in place to involve equality stakeholders and scrutinise service delivery, decision-making and progress. The Organisation engages with all its communities when making decisions, including those with protected characteristics.</i></p> <ul style="list-style-type: none"> • A range of engagement methodologies are used. • Priorities have been changed as a result of engagement with a clear and demonstrable evidence basis. • Engagement with the community effectively informs decisions. • Feedback is given and people in the community are able to challenge and have their views taken account of. | Developing | | |
| 4 | <p>Fostering good community relations</p> | Developing | | |

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| | <p><i>The organisation and its partners have a strong understanding of the quality of relations between different communities and collectively monitor relations and tensions.</i></p> <p><i>The organisation and its partners are actively engaged in planning and delivering activities that foster good relations.</i></p> <ul style="list-style-type: none"> • We are members of Castlemilk community groups and actively take part in local community planning activities. • Craigdale take part as and when required in initiatives to address any local tensions or incidents of tension within the local community. | |
| 5 | <p>Participation in public life</p> <p><i>Local people are encouraged to participate in public life or in other activities where they are under-represented.</i></p> <ul style="list-style-type: none"> • Craigdale uses a range of different methods, and it is able to innovate and find new ways to extend participation. • Craigdale has various opportunities to participate in its decision-making activity, including Board membership and these are clearly laid out in its participation and scrutiny strategies and within its model rules. | Achieving |

| Service Area: Leadership and Organisational Commitment 2022 Self - Assessment | | |
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| 1 | <p>Leadership</p> <p><i>The Senior Leadership can demonstrate their commitment to equality in decision making and how this informs the way the organisation responds to challenges.</i></p> <ul style="list-style-type: none"> • Senior Managers and the Board demonstrate knowledge and commitment to equality issues. Regular training on Equalities is undertaken. There is evidence that equality considerations inform their decision making in that an Equality Impact Assessment is undertaken for all service areas and their respective Policy. • Senior Managers and the Board understand the value and impact good communications can have and ensure that publications, websites and other communications channels are as diverse as possible. • Craigdale promotes a positive narrative around equality and good relations across the whole | Achieving |

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| | community | |
| 2 | <p>Priorities and Partnership Working</p> <p><i>Corporate and partnership documents capture the commitment of the organisation and partners to equality.</i></p> <ul style="list-style-type: none"> • Equality objectives are reflected in local strategic planning. | Developing |
| 3 | <p>Assessing Equality Impact in Policy and Decision Making</p> <p><i>Equality impact assessment is integrated systematically into planning and decision making across the organisation.</i></p> <ul style="list-style-type: none"> • There is senior level commitment to using and understanding equality impact assessment to inform planning and decision making. • Craigdale's assessments are accessible, robust and meaningful. • Craigdale takes account of the information and actions within its EIA's (App 3). The findings, recommendations and conclusions are shared effectively to inform decisions and planning. Mitigating actions are identified where appropriate | Developing |
| 4 | <p>Equality Objectives and Annual Reporting</p> <p><i>Equality objectives for the organisation have been set and published in accordance with the requirements to support the public sector Equality Duty.</i></p> <ul style="list-style-type: none"> • The specific duty to publish equality objectives has been met • Objectives are underpinned by robust equality analysis. • Objectives are SMART(Specific, Measurable Realistic, Achievable and Timely) <p>NB: THIS IS ONCE THIS STRATEGY IS FINALISED</p> | Achieving |

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| 5 | <p>Performance Monitoring and Scrutiny</p> <p><i>Appropriate structures are in place to ensure delivery and review of equality objectives.</i></p> <ul style="list-style-type: none"> • The Senior Management Team and Board have responsibility for the equality agenda. • There are resources available for supporting equality work and the staff and Board have regular equalities training. | Developing |
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| Service Area: Responsive Services and Customer Care 2022 Self - Assessment | | |
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| 1 | <p>Commissioning and Procuring Services</p> <p><i>Mechanisms are in place to ensure that equality standards are embedded throughout the procurement cycle.</i></p> <ul style="list-style-type: none"> • Procurement is undertaken through public contracts Scotland and Equalities are considered in line with the EIA for procurement. • Craigdale considers and publishes annually how the rent payer's pound is spent in regard to procurement. • Specifications take account of the different needs of users, for example through equality impact assessments. This is especially important when working in people's homes and individual requirements are taken into account. | Achieving |
| 2 | <p>Integration of equality objectives into service planning</p> <p><i>Structures are in place to ensure equality outcomes are integrated into business objectives. This is done through the business plan, strategic plans and operational plans into service delivery through EIA's</i></p> <ul style="list-style-type: none"> • Service plans are monitored regularly to ensure that equality objectives are being met. • Equality analysis is fed into planning and assessment of service plans. All service policies highlight the needs of protected groups. | Developing |
| 3 | <p>Service Delivery</p> | Developing |

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| | <p><i>The organisation has systems to collect, analyse and measure how satisfied all sections of the community are with services.</i></p> <ul style="list-style-type: none"> • Service users are consulted about service development and delivery. The outcome of the consultations are published on the Company website. • The organisation is able to analyse and measure whether all sections of the community are able to access services. • It is clear who the service users are. Craigdale undertakes mapping exercises to identify and review current participation and to highlight gaps. • Craigdale collects data about customer satisfaction with its services. • Complaints are disaggregated by protected groups. There are mechanisms in place to enable staff to introduce business improvements. • All customers are treated with dignity and respect. | |
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| Service Area: Diverse and Engaged Workforce 2022 Self - Assessment | | |
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| 1 | <p>Workforce Diversity</p> <p><i>The organisation understands its local labour market and has mechanisms in place to monitor its workforce against protected characteristics.</i></p> <ul style="list-style-type: none"> • Craigdale are members of EVH who have robust equalities monitoring in place for recruitment and gather equalities information throughout the recruitment process • Craigdale has begun to identify the steps it needs to take to achieve a diverse workforce. These are reflected in recruitment policies and procedures. • Recruitment and selection is monitored at all stages of the process by protected characteristics | Achieving |
| 2 | <p>Inclusive Strategies and Policies</p> <p><i>The equality objectives contained within workforce strategies are implemented and monitored.</i></p> | Achieving |

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| | <ul style="list-style-type: none"> • Craigdale has a basic set of policies and practices to enhance workforce equality and diversity including reasonable adjustments, equal pay, flexible working and family friendly policies. • Senior Management Team apply policies and practices across the organisation in a consistent manner for all staff. • Staff are engaged positively in employment and service transformation and in developing new roles and ways of working. • Training and development offer supports a wider equalities agenda for the organisation. • Training courses are meeting the needs of all staff. | |
| 3 | <p>Collecting, Analysing and Publishing Workforce Data</p> <p><i>The organisation regularly monitors, analyses and publishes employment data in accordance with its statutory duties.</i></p> <ul style="list-style-type: none"> • Data on applicants, people shortlisted, and the composition of the workforce is systematically collected. This can be disaggregated by the protected characteristics but is anonymised. • The gender and race pay gap is addressed by means of being part of the EVH pay structure. • Workforce information is published to cover basic legal requirements and includes analysis of pay evaluation outcomes. | Achieving |
| 4 | <p>Learning and Development</p> <p><i>The organisation provides a range of accessible learning and development opportunities to support staff, Board and engaged tenants in achieving equality objectives and outcomes.</i></p> <ul style="list-style-type: none"> • Equality and diversity forms part of the training and development for key decision makers. • Equality issues are mainstreamed into all training (e.g. training on customer care) • Employees are confident that they can deliver services to diverse customers. They are made aware of equality objectives or any changes or improvements. | Achieving |
| 5 | <p>Health and Wellbeing</p> <p><i>The organisation promotes the health and well-being of staff in its workforce and other policies.</i></p> | Achieving |

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| | <ul style="list-style-type: none"> • There are coherent Health and Wellbeing policies that address a range of related issues. • Improvements have been made to the working environment. • Staff are engaged positively in employment and service delivery. • Reasonable Adjustments are provided in a timely fashion consistently across the organisation when identified • Access to Occupational Health Services are available (well-being sessions, employee counselling etc.) • The CEO has received training on mental health awareness, and they are equipped to address staff issues. • Reports of harassment and/or bullying incidents are monitored, and appropriate action is taken to address any issues that have been identified. | |
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6.0 2022/23 Equality & Diversity Action Plan

The following action plan highlights all the developing areas of the assessment. These actions will be added to the strategic and operational delivery plans.

| Area | Actions | Target Date | By Whom |
|---|--|-------------|----------------|
| Collecting and Sharing Information | Continue to work with DPO to ensure that equalities data is collected in an agreed manner and stored and monitored correctly | April 2023 | SMT |
| Analysing and using data and information | Continue to collect and report equalities information in the correct format to the SHR | ongoing | SMT |
| Analysing and using data and information | Ensure that all data is collected anonymously and that collection methods ensure that nobody is identifiable. I.e separate equality form from any application form | ongoing | Relevant staff |

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| | received | | |
| Equality Objectives and Annual Reporting | Equality objectives for the organisation have been set and published in accordance with the requirements to support the sector Equality Duty. | ongoing | SMT |
| Priorities and Partnership Working | Ensure that all strategies and policies of CHA and where feasible partners incorporate equalities commitment | April 2023 | CEO |
| Performance Monitoring and Scrutiny | Ensure staff, Board and involved tenants have regular equalities training. | Ongoing | CEO |
| Performance Monitoring and Scrutiny | Ensure adequate resources are made available to support equalities within the business. | Ongoing | CEO |
| Integration of equality objectives into service planning | Staff development plans are monitored regularly to ensure that equality objectives are being met. | Quarterly | SMT |
| Integration of equality objectives into service planning | Equality analysis is fed into planning and assessment of service plans. All service policies highlight the needs of protected groups. (EIA) | Ongoing | SMT |
| Service Delivery | Ensure service users are consulted about service development and delivery. The outcome of the consultations are published. Ensuring that all sections of the tenants are given an equal chance to participate. | To form part of the review of TP strategy | SMT |
| Service Delivery | Ensure that we know who the service users are. a | To form part of the review of TP strategy | SMT |

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| | mapping exercise to identify and review current participation and to highlight gaps. | | |
| Workforce Diversity | Ensure we have identified the steps to take to achieve a diverse workforce. And that these are reflected in recruitment policies and procedures. | April 2023 | SMT |

7.0 Data Collection

In August 2021 the Scottish Housing Regulator published its guidance on data collection along with its recommended data collection form (app 2).

The Guide provides social landlords with comprehensive practical advice on equality data collection to support effective implementation of regulatory requirements.

The guide looks at what Social Landlords need to consider in their Equalities Strategies with regard to the collection of data. Primarily RSL's need to consider:

- why data is to be collected;
- what data is to be collected;
- what barriers to data collection exist; and
- how data is to be used.

The SHR has published regulatory requirements that every social landlord must:

“Have assurance and evidence that it is meeting all of its legal obligations associated with housing and homelessness services, equality and human rights...”

The regulatory framework specifies that this requires social landlords to collect equality information in respect of the protected characteristics. Each social landlord must:

“Have assurance and evidence that it considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies, and in its day-to-day service delivery.”

and

“... collect data relating to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, governing body members and staff. ...”

The SHR also makes clear that:

“Landlords should adhere to our statutory guidance. In certain cases, where exceptional circumstances exist, it may be appropriate for a landlord to depart from our statutory guidance. Where a landlord is considering departing from statutory guidance, it should discuss with us why a departure from the guidance is necessary before acting. The landlord should keep a record of the reasons for the departure.”

The implications of these requirements for Craigdale are that:

- the collection of data is a specific requirement, applying to all protected characteristics;
- Our equality data collection forms must cover all the protected characteristics for the groups specified by the SHR;
- This requirement does not refer to job applicants, however Craigdale must also gather personal data about job applicants, including data about an applicant's protected characteristics, and must process this in line with data protection law;
- Craigdale must adhere to the statutory guidance unless exceptional circumstances exist.

GWSF have received clarification from the EHRC and ICO that data should NOT be linked to an individual and should be completely anonymous. To that end we will use the same collection form for all purposes and ensure that the information collected will be monitored but anonymously. To ensure this the form will be kept separately from any other identifying information we gather. So, this means that an applicant's equalities data will be kept completely separate from their application form and a tenants information will be gathered but no identifiers will be on the forms. To this end Craigdale as part of the data collection requirement look at all areas where we must collect data and decide with the assistance of our Data Protection Officer what information it is required to collect and how and where the data will be stored.

8.0 Human Rights

In January 2022 the Chartered Institute of Housing published their guidance on housing as a human right. This document sets out the seven dimensions of adequate housing and forms the basis of housing as a human right (App 4). CHA have policies, strategies and processes in place to ensure we meet the requirement for housing as a basic human right but will continuously monitor these to ensure they are compliant and help to meet the ethos of housing as a human right in line with guidance.

The seven dimensions of adequate housing:

1. *Security of tenure: legal protection from forced eviction, harassment by landlords and other threats to having a settled home.*

CHA only use eviction as an absolute last resort all other remedies to avoid eviction are followed. Anyone who is being evicted are supported and given enough information to avoid the eviction in the first instance and to get emergency housing after that.

CHA have well trained and supportive staff and internal processes ensure that tenants aren't harassed by staff.

CHA have clear policies and procedures to prevent harassment and to deal with any cases in the swiftest possible way.

2. *Habitability: A dwelling in a decent state of repair that provides a dry, warm home and adequate living space.*

All CHA properties meet the SHQS and EESSH standards. CHA have an excellent repairs service and a comprehensive asset management strategy.

3. Availability of services: A dwelling has the facilities that makes it habitable, such as sanitation and waste disposal facilities, washing facilities, cooking facilities, storage, heating and lighting.

CHA properties all meet SHQS and EESSH and are maintained to a high standard with all basic amenities in place and well maintained. CHA also work closely with GCC to ensure that adequate waste disposal services are in place.

4. Affordability: Housing costs are not so high that people struggle to pay for food, fuel and other basics.

All CHA rents are classed as affordable using recognized affordability measures. CHA offer welfare rights and money management support. Tenants are consulted on rent levels and rent setting.

5. Accessibility: Suitable housing is available to those who require it, including housing that maximises the capacity of individuals with a disability or limiting illness to live independently.

CHA have adapted properties within the stock profile and work with GCC and health professional to ensure required adaptations are undertaken in a timely manner. CHA have an Adaptations Policy in place which is regularly reviewed.

6. Location: Housing is situated in areas that allow access to services (e.g., education, health, shops), paid work and participation in civic society. Housing should not be in an environment that is hazardous to health.

The Scottish Governments housing to 2040 promotes 20-minute communities. CHA stock is within 20 minutes of all required amenities such as shops, health centres, schools, places of employment or places of worship.

7. Cultural adequacy: Housing and its allocation should allow people to live in ways that express their cultural identity and does not disrupt their cultural affiliations.

CHA have policies in place to ensure that diversity is recognised and embraced. Both staff and Board Members receive regular training on both equalities and diversity. CHA have policies in place to deal with any form of harassment which includes harassment due to cultural or religious beliefs.